

Filed: April 25, 2022

**UNITED STATES COURT OF APPEALS  
FOR THE FOURTH CIRCUIT**

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**SUPPLEMENTAL BRIEFING ORDER**

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No. 19-1643 (L), Sallie Zeigler v. Eastman Chemical Company  
5:17-cv-01010-JMC

The court directs supplemental briefing as follows:

1. Each party to submit a supplemental submission addressing Keene and its implications for the pending appeals.
2. Each submission shall be no more than fifteen (15) pages and otherwise comply with Rule 27(d), FRAP.

The briefs shall be due on May 25, 2022.

The briefs and any supplemental appendix must conform to the [Fourth Circuit Brief & Appendix Requirements](#) (available as a link from this order and at [www.ca4.uscourts.gov](http://www.ca4.uscourts.gov)).

/s/ PATRICIA S. CONNOR, CLERK  
By: Rickie Edwards, Deputy Clerk